REMARKS

The Office Action mailed July 13, 2009, and made Final, has been carefully reviewed and the foregoing remarks have been made in consequence thereof.

Claims 1-22 are now pending in this application. Claims 1-8 stand rejected. Claims 9-22 are withdrawn from consideration.

The rejection of Claims 1-3 and 7 under 35 U.S.C. §102(e) as being anticipated by U.S. Publication No. 2003/0163288 to Follin et al (hereinafter referred to as "Follin") is respectfully traversed.

Follin describes a method for remotely monitoring the operation of a turbine (12) using a turbine monitoring system (10). Control sensor data from turbine (12) is collected using an on-site monitor "OSM" (14), and the validity of the control sensor data is then determined. A calculation engine (25) processes the validated control sensor data and determines unit performance characteristics, such as output and heat rate of turbine (12). If sensor data from a sensor fails validation, calculation engine (25) estimates a substitute value for sensor data using validated data from other sensors measuring the same turbine (12). Such validation enables system (10) to determine whether sensor data is available or whether system (10) should use characteristics determined by calculation engine (25). Notably, Follin does not describe nor suggest determining at least one derived quantity from at least one measured process parameter associated with at least a first of equipment combinations and from at least one measured process parameter associated with at least a second of equipment combinations, wherein at least one derived quantity is associated with at least one of the plurality of equipment combinations and is compared to a measured process parameter to verify an operability of at least one sensor.

Claim 1 recites a method for operating a facility having a plurality of equipment combinations, each equipment combination is operable interactively with at least one other equipment combination, wherein the method comprises "receiving a plurality of measured process parameters, in real-time, for each of the plurality of equipment combinations,

wherein the equipment combinations include at least a driver machine and a driven machine . . . determining at least one derived quantity from at least one measured process parameter associated with at least a first of the equipment combinations and from at least one measured process parameter associated with at least a second of the equipment combinations, wherein the at least one derived quantity is associated with at least one of the plurality of equipment combinations and is compared to a measured process parameter to verify an operability of at least one sensor . . . and recommending a change to an equipment operation based on the measured process parameters and the at least one derived quantity."

Follin does not describe nor suggest a method for operating a facility having a plurality of equipment combinations, as is recited in Claim 1. More specifically, Follin does not describe nor suggest receiving a plurality of measured process parameters, in real-time, for each of a plurality of equipment combinations, wherein the equipment combinations include at least a driver machine and a driven machine, and determining at least one derived quantity from at least one measured process parameter associated with at least a first of the equipment combinations and from at least one measured process parameter associated with at least a second of the equipment combinations, wherein the at least one derived quantity is associated with at least one of the plurality of equipment combinations and is compared to a measured process parameter to verify an operability of at least one sensor, in combination with recommending a change to an equipment operation based on the measured process parameters and the at least one derived quantity. Rather, in contrast to the present invention, Follin describes calculating unit performance characteristics of a turbine based on validated control sensor data obtained from the same turbine, and validating the calculated characteristics against measured sensor data from the same turbine.

More specifically, Follin describes estimating and/or calculating a validation value or substitute sensor data using validated sensor data obtained from sensors measuring the same turbine from which the data being validated or the faulty sensor data is received. In contrast, the present invention determines a derived quantity associated with at least one of the plurality of equipment combinations using measured process parameters from a first and a second equipment combination. Moreover, Follin does not describe nor suggest determining

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at least one derived quantity associated with at least one of a plurality of equipment combinations based on at least one measured process parameter associated with at least a first of the equipment combinations and based on at least one measured process parameter associated with at least a second of the equipment combinations. Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Follin.

Claims 2-3 and 7 depend from independent Claim 1. When the recitations of Claims 2-3 and 7 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-3 and 7 likewise are patentable over Follin.

For the reasons set forth above, Applicants respectfully request that the Section 102(e) rejection of Claims 1-3 and 7 be withdrawn.

The rejection of Claims 4-6 and 8 under 35 U.S.C. §103(a) as being unpatentable over Follin in view of U.S. Publication No. 2006/0259163 to Hsiung et al (hereinafter referred to as "Hsiung") is respectfully traversed.

Follin is described above.

Hsiung describes a process monitoring and control system that includes a software interface (162) that couples data from a processing plant to a plurality of processes for operations and analysis. Software interface (162) couples to server (166), and server sends the data to a data synchronization layer (167) then to a statistical layer (168) to analyze the data. System also includes expert systems (170) and model building (176) systems to predict behavior of the processes, as well as model monitoring (178) based on inputs from the processing plant, and compare the predicted behavior to measured inputs. The system also includes an output module, including display systems (184) and desktop applications (185). Notably, Hsiung does not describe nor suggest determining at least one derived quantity from at least one measured process parameter associated with at least a first of equipment combinations and from at least one measured process parameter associated with at least a second of equipment combinations, wherein at least one derived quantity is associated with at

least one of the plurality of equipment combinations and is compared to a measured process parameter to verify an operability of at least one sensor.

Claims 4-6 and 8 depend from independent Claim 1, which is recited above.

No combination of Follin and Hsiung describes nor suggests a method for operating a facility having a plurality of equipment combinations, as is recited in Claim 1. More specifically, no combination of Follin and Hsiung describe nor suggest receiving a plurality of measured process parameters, in real-time, for each of a plurality of equipment combinations, wherein the equipment combinations include at least a driver machine and a driven machine, and determining at least one derived quantity from at least one measured process parameter associated with at least a first of the equipment combinations and from at least one measured process parameter associated with at least a second of the equipment combinations, wherein the at least one derived quantity is associated with at least one of the plurality of equipment combinations and is compared to a measured process parameter to verify an operability of at least one sensor, in combination with recommending a change to an equipment operation based on the measured process parameters and the at least one derived quantity. Rather, in contrast to the present invention, Follin describes calculating unit performance characteristics of a turbine based on validated control sensor data obtained from the same turbine, and validating the calculated characteristics against measured sensor data from the same turbine, and Hsiung merely describes a system for monitoring an industrial process and outputting its data analysis results, which does not overcome the deficiencies of Follin.

More specifically, Follin describes estimating and/or calculating a validation value or substitute sensor data using validated sensor data obtained from sensors measuring the same turbine from which the data being validated or the faulty sensor data is received. In contrast, the present invention determines a derived quantity associated with at least one of the plurality of equipment combinations using measured process parameters from a first and a second equipment combination. Moreover, no combination of Follin and Hsiung describes nor suggests determining at least one derived quantity associated with at least one of a plurality of equipment combinations based on at least one measured process parameter
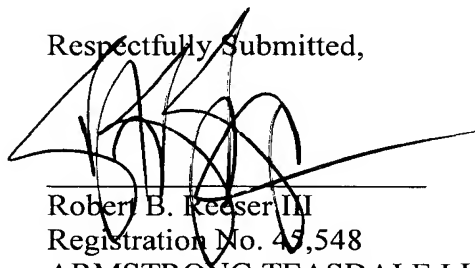
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associated with at least a first of the equipment combinations and based on at least one measured process parameter associated with at least a second of the equipment combinations. Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Follin in view of Hsiung.

Claims 4-6 and 8 depend from independent Claim 1. When the recitations of Claims 4-6 and 8 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 4-6 and 8 likewise are patentable over Follin in view of Hsiung

For the reasons set forth above, Applicants respectfully request that the Section 103(a) rejection of Claims 4-6 and 8 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,

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